

201-15225

**The Goodyear Tire & Rubber Company**  
**Akron, Ohio 44316 - 0001**

May 4, 2004

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

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EPA  
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Dear Administrator:

**Re: HPV Challenge Program: Company Registration Number**

In 1999, The Goodyear Tire & Rubber Company agreed to participate in the HPV Challenge program and, as a member of the Petroleum HPV Testing Group as administered by the American Petroleum Institute (API), agreed to sponsor the following chemical:

CAS Number: 68919-17-5

Chemical Abstract Name: Hydrocarbons, C12-20, catalytic alkylation by-products

However, the Petroleum HPV Testing Group as administered by the American Petroleum Institute (API) was unable to place this chemical into any of their sponsored categories for voluntary testing. Consequently, the Petroleum HPV Testing Group as administered by the American Petroleum Institute (API) withdrew their sponsorship in 2003.

For years, the chemical in question was a waste at a single Goodyear manufacturing location and, as a waste, was incinerated. Through a waste reduction program at the manufacturing site, a single customer was located and this customer was willing to pay a few cents per pound for the by-product stream. At the customer's site our by-product stream was blended with other streams and sold as a fuel.

Currently, it appears that The Goodyear Tire & Rubber Company may be the only manufacturer of the by-product stream and, as such, would need to bear the full burden of the voluntary testing. Financially, this is a burden that The Goodyear Tire & Rubber Company can not bear. Consequently, The Goodyear Tire & Rubber Company will no longer agree to sponsor this chemical in the HPV Challenge program.

Sincerely,

Michael W Smith  
Consultant,  
Global Chemical Material Management